

# EXHIBIT E

1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE MIDDLE DISTRICT OF PENNSYLVANIA  
3 ANTHONY BARASKY, :  
4 Plaintiff :  
5 :  
6 vs. :  
7 :  
8 KEVIN DENT, TYSON HAVENS, : CASE NO. 4:21-CV-02041  
9 JOSHUA BELL, CLINTON :  
10 GARDNER, CHRISTOPHER :  
11 KRINER, JOSEPH HOPE, :  
12 LYCOMING COUNTY, OLD :  
13 LYCOMING TOWNSHIP, and :  
14 CITY OF WILLIAMSPORT, :  
15 Defendants :  
16 :  
17 :  
18 :  
19 :  
20 :  
21 :  
22 COUNSEL PRESENT:  
23 LEONARD GRYSKEWICZ, JR., ESQUIRE  
24 Lampman Law  
25 2 Public Square  
Wilkes-Barre, Pennsylvania 18701  
For - Plaintiff

1 COUNSEL PRESENT: (CONTINUED)  
2 AUSTIN WHITE, ESQUIRE  
3 McCormick Law Firm  
4 835 West Fourth Street  
5 Williamsport, Pennsylvania 17701  
6 For - Defendants Kevin Dent and Tyson Havens  
7 SHAWNA R. LAUGHLIN, ESQUIRE  
8 William J. Ferren & Associates  
9 P.O. Box 2903  
10 Hartford, Connecticut 06104-2903  
11 For - Defendants Joshua Bell, Clinton Gardner  
12 and City of Williamsport  
13 MARK J. KOZLOWSKI, ESQUIRE  
14 Marshall Dennehey  
15 P.O. Box 3118  
16 Moosic, Pennsylvania 18507  
17 For - Defendants Old Lycoming Township,  
18 Joseph Hope and Christopher Kriner  
19  
20  
21  
22  
23  
24  
25

1 INDEX TO WITNESSES  
2 JOSEPH W. HOPE DIRECT CROSS REDIRECT RECROSS  
3 Examination by:  
4 Mr. Gryskewicz 4 -- 47 --  
5 Ms. Laughlin -- 46 -- --  
6  
7  
8  
9  
10  
11  
12

13 INDEX TO EXHIBITS  
14 FOR - PLAINTIFF MARKED ADMITTED  
15 Plaintiff's Exhibit No. 1 42 --  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

1 STIPULATION  
2 It is hereby stipulated by and between  
3 counsel for the respective parties that signing,  
4 sealing, certification and filing are hereby waived;  
5 and that all objections except as to the form of the  
6 question are reserved to the time of trial.  
7  
8 \* \* \*  
9  
10 JOSEPH W. HOPE, called as a witness, having  
11 been duly sworn or affirmed, testified as follows:  
12  
13 DIRECT EXAMINATION  
14 BY MR. GRYSKEWICZ:  
15 Q Chief Hope, have you ever been deposed  
16 before?  
17 A Yes.  
18 Q Okay. I'm going to give you some, you know,  
19 just general instructions. I'm sure your attorney has  
20 already told you and, you know, you probably heard  
21 before. If you don't understand a question I ask you,  
22 let me know. I will rephrase it. If you don't know  
23 the answer to a question, that's also a perfectly  
24 acceptable answer. If at any time you need a break  
25 or, you know, something comes up, just let us know.  
And do you have any questions before we start?

1 A No, sir. 5

2 Q Okay. Could you state and spell your name

3 for the record?

4 A Joseph W. Hope. J-O-S-E-P-H, W., Hope,

5 H-O-P-E.

6 Q And where are you currently employed?

7 A Lycoming County central processing part time.

8 Q And how old are you today?

9 A 61.

10 Q How were you employed on October 1st of 2020?

11 A I was the chief of police for Old Lycoming

12 Township Police Department.

13 Q And when did you stop being the chief of

14 police for Old Lycoming Township?

15 A I retired March 31st of 2021. Or, I'm sorry.

16 Yes, 2021. Yes.

17 Q How long were you the chief of the Old

18 Lycoming Township Police Department in total?

19 A Five years.

20 Q So then you would have been about -- chief

21 for about four years in October of 2020, roughly?

22 A Roughly, yes.

23 Q How long have you been a police officer?

24 A It was just shy of 25 years. Probably about

25 24 years and two months, three months.

1 Q Okay. And do you still consider yourself a 6

2 police officer or did that end when you retired as

3 chief?

4 A Well, I think that's always in your -- in

5 your blood, but I mean, it's not -- I don't have

6 any -- you know, I'm not employed as a police officer,

7 no.

8 Q Okay. I wasn't sure if they would still deem

9 you a police officer in the central processing unit.

10 A No, no.

11 Q Okay. In October of 2020, was the Old

12 Lycoming Township Police Department working with the

13 Lycoming County Narcotics Enforcement Unit?

14 A When was that?

15 Q October of 2020.

16 A Working with?

17 Q Yes.

18 A We were -- we had a request from Lycoming

19 County Narcotics Unit --

20 Q And would you agree --

21 A -- for assistance. I'm sorry. For

22 assistance.

23 Q No, that's okay. Yep. And if at any time,

24 you know, you need to finish your question or

25 something --

1 A Yes. 7

2 Q -- just let know, I will stop talking and let

3 you finish your answer.

4 The Lycoming County Narcotics Enforcement

5 Unit is often referred to as the NEU. Is that right?

6 A That is correct.

7 Q So could you describe for me how the Old

8 Lycoming Township Police Department would work with

9 the NEU in the area of October of 2020?

10 MR. KOZLOWSKI: Object to the form. You can

11 answer.

12 THE WITNESS: That day Sergeant Kriner, who

13 was my sergeant, approached me and said that he

14 received a -- it was actually, I believe, on the 2nd

15 of October. He received a phone call from Detective

16 Bell, who was part of the NEU -- is that okay if I use

17 NEU?

18 BY MR. GRYSKEWICZ:

19 Q Yes, that's why I set it up that way.

20 A Who was part of the NEU, and that they had a

21 controlled buy that they were going to do -- an arrest

22 for a controlled buy within our jurisdiction, and they

23 wanted us to assist them in stopping the vehicle.

24 Q Okay. Now, in general would the -- not

25 necessarily specifically to Anthony Barasky's case,

1 but in general, would -- how often do you think the 8

2 Lycoming Township -- the Old Lycoming Township Police

3 Department would work with the NEU in 2020?

4 A In 2020? I don't recall. In other words,

5 it's not like a daily basis or anything or weekly.

6 Q Okay.

7 A Generally whenever they would request our

8 assistance because it's our jurisdiction. And pretty

9 much in Lycoming County, even if we were to go

10 somewhere -- being Old Lycoming Township Police

11 Department would go somewhere to serve a warrant or do

12 something --

13 Q Um-hum.

14 A -- we would notify that agency so that they

15 had somebody present.

16 Q Okay. And I know you said you're offering

17 assistance to the NEU. Could you describe what that

18 assistance would be generally?

19 A On that date?

20 Q Just in general in 2020, if the NEU called

21 you up and said, hey, we need your help with

22 something, what would your police department normally

23 do?

24 A Normally we would have a briefing to see

25 what -- what the incident or -- the incident consisted

<p>1 of.</p> <p>2 Q Would your police department be in more of a</p> <p>3 support role providing like extra manpower or would</p> <p>4 you actually be conducting investigations with them?</p> <p>5 A No, we don't do the investigations with them.</p> <p>6 It's totally separate from Old Lycoming. We would</p> <p>7 just be in a support role.</p> <p>8 Q Okay. And then you said on October 2nd you</p> <p>9 believe Officer Kriner was contacted by Detective Bell</p> <p>10 of the NEU?</p> <p>11 A Yes. And he approached me and said that they</p> <p>12 wanted the assistance -- or some assistance from us</p> <p>13 because it was in our jurisdiction.</p> <p>14 Q And that was Officer Kriner that approached</p> <p>15 you?</p> <p>16 A Yeah. He was sergeant at that time. He was</p> <p>17 my sergeant.</p> <p>18 Q Prior to October 2nd of 2020, did you have</p> <p>19 any involvement with the NEU's investigation into a</p> <p>20 person Matthew Sumpter?</p> <p>21 A The NEU's investigation? No, I did not.</p> <p>22 Q And to the best of your knowledge, did the</p> <p>23 Old Lycoming Township Police Department have any</p> <p>24 involvement prior to October 2nd into -- in the</p> <p>25 investigation into Matthew Sumpter?</p>	<p>1 A At the Old Lycoming Township Police</p> <p>2 Department in the patrol room which we used for a</p> <p>3 briefing room also.</p> <p>4 Q And who was present at that briefing?</p> <p>5 A I recall Sergeant Kriner and myself. Officer</p> <p>6 Brown and Officer Engel were on patrol that day. I</p> <p>7 believe we brought them in because -- and Detective</p> <p>8 Bell, Detective Havens, and Detective Gardner, I</p> <p>9 believe. I know Detective Dent was involved, but I'm</p> <p>10 not sure he was at the briefing. I don't recall that.</p> <p>11 Q And Officers Hope and Engel, they were</p> <p>12 members of the Old Lycoming Township Police</p> <p>13 Department?</p> <p>14 A Brown and Engel.</p> <p>15 Q Brown and Engel?</p> <p>16 A Yes.</p> <p>17 Q Sorry.</p> <p>18 A They were both patrolmen.</p> <p>19 Q And who was leading that briefing?</p> <p>20 A Detective Bell.</p> <p>21 Q And what was said at that briefing?</p> <p>22 A Detective Bell advised us that the</p> <p>23 narcotic -- the NEU had a controlled buy. They were</p> <p>24 attempting to set up a controlled buy for the arrest</p> <p>25 of Mr. Barasky, and it was located in our jurisdiction</p>
<p>1 A No. For the NEU's case?</p> <p>2 Q Yes.</p> <p>3 A No.</p> <p>4 Q When was the first time you learned of an</p> <p>5 Anthony Barasky?</p> <p>6 A The day of the briefing.</p> <p>7 Q And that would have been October 2nd?</p> <p>8 A October 2nd. Yes, I'm sorry.</p> <p>9 Q So -- just so I have my timeline right here,</p> <p>10 I guess. Detective Bell would have called Officer</p> <p>11 Kriner first and approached him about getting</p> <p>12 assistance from your police department?</p> <p>13 A Officer Bell contact -- yes. I was</p> <p>14 approached by Sergeant Kriner who received a phone</p> <p>15 call from Detective Bell of the NEU requesting</p> <p>16 assistance, yes, because it was in our jurisdiction.</p> <p>17 Q Okay. And then after officer -- or Sergeant</p> <p>18 Kriner approached you, what did you do in response?</p> <p>19 A Oh, he asked if it was okay if -- you know,</p> <p>20 if they would come up and do a briefing on what they</p> <p>21 had with Mr. -- well, we didn't know at that time it</p> <p>22 was Mr. Barasky, but on the case. And I said, yes,</p> <p>23 we'll see if we can assist them.</p> <p>24 Q And where -- where did that briefing take</p> <p>25 place?</p>	<p>1 of Hepburn Township, which we contracted police</p> <p>2 services to, in a housing development on Brentwood</p> <p>3 Drive. Mr. -- the CI in the case, they identified as</p> <p>4 Matthew Sumpter who lives in that development on</p> <p>5 Brentwood Drive.</p> <p>6 Detective Bell at that point proceeded to</p> <p>7 provide us with information that they had other buys</p> <p>8 from Mr. Barasky, and they did present us with his</p> <p>9 photograph and a criminal history for him. His</p> <p>10 criminal history did show convictions of drug arrests</p> <p>11 and delivery. And one of the concerns they had with</p> <p>12 Mr. Sumpter's -- with the location or the prescribed</p> <p>13 location of where the past purchases have been made to</p> <p>14 Mr. Sumpter from Mr. Barasky, was at the development</p> <p>15 in front of his house.</p> <p>16 They were concerned because Mr. Barasky had</p> <p>17 fled police previously and actually crashed into a</p> <p>18 building during the day. And to get to Mr. Sumpter's</p> <p>19 house, you had to go up to -- up Lycoming Creek Road,</p> <p>20 which obviously you're not familiar with, but it is</p> <p>21 a -- it is a four-lane road. It's the main artery</p> <p>22 that leads north from the City of Williamsport all the</p> <p>23 way up to Trout Run. That has multiple businesses,</p> <p>24 side streets, residential -- residential homes and</p> <p>25 supermarkets, et cetera, almost the full length of</p>

13

1 that.

2 So they were concerned about -- they were  
3 concerned about doing a stop on Mr. Barasky in that  
4 location for safety reasons, so they asked us if there  
5 was someplace else that there was a possibility we  
6 would stop him that might be a little bit safer.  
7 Weren't sure at that time, but we knew that there was  
8 only one road that led to Mr. Sumpter's development.  
9 That road is just a two-lane road, rural, wooded. Has  
10 some residents, but most of them are back off the  
11 roadway, you know, access by driveways. And then you  
12 got up -- as you got about a half mile up that road,  
13 you turn into the development.

14 Q Um-hum. So let me back you up and ask you.  
15 So Detective Bell said that they had past buys between  
16 Barasky and Sumpter, is that right?

17 A That is correct.

18 Q Could you describe what he told you about  
19 those past buys, how frequently they were, when they  
20 happened, et cetera?

21 A Alls I recall is that they had -- can you ask  
22 that again?

23 Q Yes. Absolutely.

24 A I want to make sure I understand it.

25 Q So could you describe how Detective Bell

14

1 presented the past buys he said he knew of between  
2 Anthony Barasky and Matthew Sumpter?

3 A He said -- I think I stated, but he said that  
4 basically Mr. Sumpter would make a phone call for  
5 heroin, and he would contact Mr. Barasky by phone.  
6 Mr. Barasky then would come and deliver the drugs at  
7 his residence in the development.

8 Q Did Detective Bell present that to you in a  
9 way that made it seem like it was a controlled buy  
10 that police observed it or something that just Matthew  
11 Sumpter reported to police?

12 A He didn't really say, that I recall, anyhow.

13 Q Did he say how often that the buys would have  
14 happened in the past?

15 A No, he didn't.

16 Q And did he tell you when the last alleged buy  
17 occurred?

18 A No, I don't believe so.

19 Q Okay. And I know you were describing  
20 Lycoming Creek Road for us.

21 A Yes.

22 Q That's the four-lane road, correct?

23 A That's a four-lane road.

24 Q Is that the area they were originally  
25 planning on stopping Mr. Barasky?

15

1 A No, they did not want to stop him because

2 that would have been the route that went to this road  
3 that led to the development. He would have had to  
4 take that route. They did not want to stop him there  
5 due to the past with the fleeing of officers and the  
6 safety of everybody, so they wanted to know if there's  
7 someplace else that they could do it before he  
8 actually got to the development.

9 Q Okay. Did they say -- strike that. Was  
10 there a reason they didn't want to stop him on  
11 Brentwood Drive inside the development by where  
12 Sumpter lived?

13 A I think because of safety issues. I mean,  
14 it's a development. It's a common develop -- I don't  
15 want to say common, but it would be common as you can  
16 go into a development, have houses with small yards.  
17 It wasn't like spread out. So I believe it was more  
18 probably a safety issue.

19 Q Okay. And inside that development on  
20 Brentwood Drive, would there be lines painted on those  
21 roads?

22 A No.

23 Q Okay. So a lane big enough for two cars to  
24 pass each other --

25 A Yes.

16

1 Q -- but still no lines painted. It's a  
2 narrow --

3 A Correct. And they are all paved.

4 Q And then you said you don't remember  
5 Detective Dent being at that briefing. Is that right?

6 A I don't recall him being there.

7 Q Do you know if he was on the phone or  
8 communicating with officers in some other way there?

9 A During the briefing?

10 Q Yes.

11 A I don't know.

12 Q Did Detective Bell tell you where he got the  
13 information he was presenting to you during that  
14 briefing?

15 A Just in general, as I already stated, that  
16 they had buys from him before, and that Mr. Sumpter  
17 had purchased drugs from him and it usually occurs in  
18 the development.

19 Q Did Detective Bell present you with Matthew  
20 Sumpter's criminal history?

21 A We were aware of Mr. Sumpter's. I can't  
22 remember if he did. We were familiar with Mr.

23 Sumpter's -- Old Lycoming had had some arrests that we  
24 were involved in with Mr. Sumpter.

25 Q Okay. So you and Officer Kriner would have

1 been aware of Matthew Sumpter's criminal record?  
 2 A Yes, to an extent. I mean, I don't know if  
 3 he had anything outside of that, out of our arrests  
 4 or --  
 5 Q Okay. Were you ever involved personally in  
 6 arresting Matthew Sumpter?  
 7 A Not -- I was familiar with some of the  
 8 investigations. He supported his drug habit with  
 9 breaking into cars in his neighborhood and stuff, and  
 10 pretty much he was the go to if something happened in  
 11 the neighborhood. But he was always up front with us.  
 12 We never had an issue with him. He always seemed to  
 13 be -- he was your drug addict. He had an issue with  
 14 drugs and -- but, you know, when you approached him,  
 15 he didn't lie to us or anything like that.  
 16 Q Did -- at the briefing on October 2nd, who  
 17 did you believe was the lead investigator on the  
 18 Barasky investigation?  
 19 A The lead investigator?  
 20 Q Um-hum.  
 21 A I think it was probably Officer -- or  
 22 Detective Dent, and Officer Bell was just leading the  
 23 briefing.  
 24 Q Prior to arresting Anthony Barasky on October  
 25 2nd, did you have any contact directly with Detective

17

1 A Correct.  
 2 Q And the same, I know we talked about Officer  
 3 Kriner. Are you referring to Christopher Kriner?  
 4 A That's correct.  
 5 Q So after the briefing, did you go with  
 6 Gardner and Bell in their undercover car to find a  
 7 place to stop Anthony?  
 8 A I did. I didn't go in their car. I went in  
 9 my car. They -- okay. We went to an area. But what  
 10 I wanted to add to that is Officer Havens was going to  
 11 be surveillance -- and that would be Tyson Havens,  
 12 would be a surveillance -- in a surveillance vehicle  
 13 undercover somewhere on that route of Lycoming Creek  
 14 Road to notify us if, in fact, Mr. Barasky was on his  
 15 way.  
 16 And then to follow up with your question on  
 17 going to the location, yes, we did go up, turned onto  
 18 Eckard Road, which is the road that leads to the  
 19 development. Approximately a hundred to 150 feet off  
 20 of Lycoming Creek Road on Eckard Road we located a  
 21 gravel lot that belonged to the Roan RV travel trailer  
 22 for their storage lot.  
 23 Q Um-hum.  
 24 A We thought that would -- they felt that that  
 25 would give us enough time. You know, he first would

19

1 Dent about the Barasky investigation?  
 2 A I did not. This was the first we heard  
 3 anything, was at that briefing.  
 4 Q Okay. At that briefing did you also discuss  
 5 a plan to stop Anthony Barasky's car and arrest him?  
 6 A As I stated, Detective Bell was concerned,  
 7 obviously for the safety, as we would be, too, after  
 8 seeing, you know, his prior history and what had  
 9 happened with the fleeing. It would -- Officer Bell  
 10 said that he and Officer -- or I'm sorry. I keep  
 11 getting officer -- I'm not used to Detective.  
 12 He and Detective Gardner would go in their  
 13 undercover vehicle with me to a location to try to  
 14 find somewhere on that road where we could post, so  
 15 that if the -- you know, if the deal was going through  
 16 and Mr. Barasky was arriving to the location, that we  
 17 could -- they could intercept him before he would  
 18 reach the residence of Mr. Sumpter.  
 19 Q And just so I make sure I have the names  
 20 right, too. When you refer to Detective Bell, do you  
 21 mean Joshua Bell?  
 22 A Yes.  
 23 Q And when you refer to Officer Gardner or  
 24 Detective Gardner, are you referring to Clinton  
 25 Gardner?

18

1 have to commit to turning onto that road to head to  
 2 the development from Lycoming Creek Road. Plus it  
 3 would give us an opportunity to get out -- you know,  
 4 to attempt to stop him before he actually reached the  
 5 development. Which I stated was like -- it's like  
 6 four tenths of a mile from Lycoming Creek Road to  
 7 where you turn into the development on Eckard Road.  
 8 Q Okay. Now, when you got in the cars to go  
 9 and find this location to stop Mr. Barasky, did you go  
 10 back to the police station then to discuss it again --  
 11 A No.  
 12 Q -- or you just stayed there and carried out  
 13 the plan?  
 14 A We stayed there. And part of that -- because  
 15 of the fleeing and the concern and that being that  
 16 road did continue past the development, so we were  
 17 going to put a marked unit at the development entrance  
 18 with Officers Engel and Officer Brown with the stop  
 19 sticks. Just in case he would attempt to flee, we  
 20 could stop him and create a safe and -- you know, not  
 21 have any safety issues. Sergeant Kriner was actually  
 22 just a little bit past them on that road in case -- to  
 23 intercept Mr. Barasky if he would flee, but still  
 24 close enough if we needed assistance of any kind.  
 25 Q Prior to arresting Anthony Barasky, did you

20

1 know or were you told if Matthew Sumpter ever worked  
2 as an informant for the NEU previously?

3 A No.

4 Q I know you're a police officer for 25 years.  
5 I'm sure you have extensive training and experience in  
6 your career. Have you ever used informants before in  
7 drug investigations?

8 A No, I haven't.

9 Q Did you receive any like trainings in using  
10 informants before?

11 A We -- I did have some training, both state,  
12 local, federal, you know, in drug investigations and  
13 arrests. That -- I was more the patrol guy coming up  
14 through the ranks, and my -- in Old Lycoming Township  
15 Police Department, we tried to get officers that  
16 specialized in various -- various things they wanted  
17 to do.

18 For instance, I'm a certified fire  
19 investigator, so that was my -- I had 48 years in the  
20 fire service, so that was my -- the volunteer fire  
21 service, so that was my -- that's what I inspired to  
22 do, is to assist in that. There was others that were  
23 involved in -- in drug investigations.

24 Q Through any of your training and experience,  
25 did you learn that it would be important if you were

1 using an informant to know if they provided accurate  
2 information previously?

3 A Yes.

4 Q Is that, yes, you were taught that?

5 A Yes.

6 Q Okay. I'm sorry. Sometimes it doesn't come  
7 out right on the transcript, so I just clarify the  
8 question.

9 A Yes.

10 Q I'm not trying to be a wise guy.

11 Do you remember filling out interrogatories  
12 in this case, written responses with your attorney?

13 A Yes.

14 Q In response to Interrogatory 12 you wrote  
15 that you were informed that a phone call between the  
16 Plaintiff and the confidential informant was made  
17 corroborating the details of a controlled sale of  
18 heroin. Do you remember that? If you don't, I could  
19 show it to you.

20 A No, just repeat it again.

21 Q Yeah. Do you want to read your response?

22 A No, I want you to -- the question.

23 Q So in response to Interrogatory 12, you wrote  
24 that you were informed that a phone call between the  
25 Plaintiff, Anthony Barasky, and the confidential

1 informant, Matthew Sumpter, was made corroborating the  
2 details of the controlled sale of heroin.

3 A That was -- yes, that's when we were on site  
4 in that gravel lot.

5 Q Okay. Do you --

6 A We were notified via radio.

7 Q Do you know who notified you via radio of  
8 that?

9 A I don't. It was one of the NEU guys. I  
10 don't know if somebody relayed it to Bell and -- and  
11 Gardner. I just -- they just said that the phone call  
12 had been made and Mr. Barasky was on his way.

13 Q Okay. And was that almost like the exact  
14 language they relayed? Like there's a phone call made  
15 and Mr. Barasky's on his way. Was it any more  
16 specific than that?

17 A Well, I think they said that he is en route  
18 to do the -- with drugs to do the deal, something to  
19 that effect. I mean, I don't recall exactly what was  
20 said.

21 Q Did the NEU officers ever tell you that they  
22 had no way of identifying Anthony Barasky's voice on  
23 that phone call?

24 A No.

25 Q Did you ever ask them how they knew it was

1 Anthony Barasky on the other side of the phone call?

2 A No, not -- not at that point. I mean, we  
3 were in the field and --

4 Q So it would have been unusual, I guess, if  
5 you picked up the radio and, you know, questioned them  
6 how they knew it?

7 A Correct. Yes.

8 Q Were you told how many phone calls were made  
9 between the informant and Anthony Barasky that day?

10 A No, I was not.

11 Q And I believe from your previous answer, they  
12 didn't tell you specifically what was said on the  
13 phone call, that was more just, you know, he's on his  
14 way?

15 A That's correct.

16 Q And I know you said previously in your  
17 testimony that the NEU officers informed you and you  
18 knew of Anthony Barasky's criminal record, that there  
19 was a fleeing accusation previously?

20 A Correct.

21 Q Did you know what the specifics of that  
22 fleeing was?

23 A Well, actually until they brought it up that  
24 day --

25 Q Um-hum.



1 A -- I was actually working that day, but it  
2 was away from our jurisdiction, but I remember when he  
3 crashed into the side of the Kmart.  
4 Q Okay. And I guess that would have been a big  
5 deal in this area --  
6 A Oh, yeah.  
7 Q -- if somebody crashes into the side of a  
8 Kmart?  
9 A Yeah. And then fled across parking lots and  
10 there was a foot pursuit and -- but, yeah, we weren't  
11 involved in it. But once they had said that this is  
12 the guy that fled, and then I recall that happening.  
13 Q Okay.  
14 A I think it was a year or so before, whatever.  
15 It wasn't --  
16 Q If I told you it was around 2016, would that  
17 sound right? If you don't remember, that's fine.  
18 A I don't remember.  
19 Q And you said they actually -- the NEU  
20 officer, Detective Bell, I believe you said, showed  
21 you a copy of Anthony's criminal history --  
22 A That's correct.  
23 Q -- that would have listed that?  
24 A I don't know. I don't recall if that listed  
25 it or not. I just know that when they stated it, you

1 know, I remember seeing the drug charges.  
2 Q So I know you took us to the point where you  
3 selected a location for the traffic stop by that  
4 gravel lot. What was the plan once Anthony Barasky's  
5 vehicle came into the area to, you know, execute the  
6 traffic stop?  
7 A The reason that officer -- or Detective Bell  
8 and Detective Gardner were with me is so they could  
9 point out the vehicle so that I could stop it.  
10 Q Okay. And were they in the same car as you  
11 or a different vehicle?  
12 A They were directly behind me in an undercover  
13 car.  
14 Q Okay. And you said Tyson Havens was located  
15 somewhere on Lycoming Creek Road to spot Anthony  
16 Barasky's car earlier?  
17 A If he was en route via that way, yes, he  
18 would be able to -- would be able to identify the car  
19 and give us information that he was on the way. Yes.  
20 I don't know where on Lycoming Creek Road --  
21 Q Okay.  
22 A -- but I know it was Lycoming Creek Road.  
23 Q Would you agree with me that all the officers  
24 at that briefing worked together to create the plan to  
25 stop Anthony Barasky's car?

1 A I think the plan was already from the NEU to  
2 provide the safest stop we could for -- you know, Mr.  
3 Barasky and all the residents in the township. We  
4 just went, you know, with the plan as far as where we  
5 could. I mean, obviously they didn't work in our  
6 jurisdiction a lot so they didn't have ideas where to  
7 park, where to --  
8 Q So you would say that the general plan came  
9 from the NEU that, you know, we want to stop him in a  
10 location before the development because of the fleeing  
11 concern?  
12 A But not on Lycoming Creek Road.  
13 Q But not --  
14 A Someplace where it could be managed.  
15 Q But then I suppose you lended your local  
16 expertise to select the specific location for the  
17 stop?  
18 A Well, we went up -- we went to that area  
19 along -- myself along with officer -- or Detective  
20 Bell and Gardner and we found that gravel lot. It  
21 was -- it was far enough off Lycoming Creek Road to  
22 know that if Mr. Barasky would turn onto there, it was  
23 more than likely not heading to the development. We  
24 had that short distance before he got to the  
25 development to stop him. I don't recall who placed

1 the Officers Engel and Brown with the stop sticks past  
2 the development. It was just a general consensus, but  
3 they went there and that's where they were, so the  
4 marked car would be there.  
5 Q Um-hum.  
6 A And then they were behind their car with the  
7 stop sticks, if, in fact, we couldn't stop him.  
8 Q And were you parked in that gravel lot  
9 waiting for Mr. Barasky to show up?  
10 A Yes.  
11 Q How long do you think you waited in that  
12 gravel lot before you were told Barasky was on his way  
13 in that radio communication you discussed?  
14 A I hate to speculate, but it wasn't very long.  
15 But I don't know.  
16 Q How -- and an estimate it was fine, too,  
17 between when, you know, it gets -- I guess strike  
18 that.  
19 Did Tyson Havens call out over the radio that  
20 he observed Anthony Barasky on Lycoming County Creek  
21 Road at some point?  
22 A We first -- we first got the notification,  
23 and as I stated before, I don't recall who.  
24 Q Okay.  
25 A Who -- it came over the radio that the phone



1 call had been made and Mr. Barasky was on his way --  
 2 Q Um-hum.  
 3 A -- to that.  
 4 Q Um-hum.  
 5 A You know. It was a short time later --  
 6 Q Um-hum.  
 7 A -- when we were notified that -- and I don't  
 8 recall again if it was Havens or -- or if they radioed  
 9 or -- to Gardner and Bell or who it was, but said that  
 10 he had just passed the location of Trooper Havens.  
 11 Q Okay.  
 12 A And he was on his way north on Lycoming Creek  
 13 Road, which was consistent with the route he would  
 14 take to get to the Eckard Road and go to the  
 15 development.  
 16 Q How were you informed of which car to stop  
 17 then?  
 18 A By Bell. Bell and Gardner. I don't even  
 19 remember which one it was, but it was one of them in  
 20 the car said, that's the car, stop it.  
 21 Q Okay. And then what did you do in response  
 22 when you heard that communication over the radio?  
 23 A I pulled out of my location. They were right  
 24 behind me.  
 25 Q Um-hum.

1 A Bell and Gardner. I immediately turned on my  
 2 lights and siren and was behind the vehicle as it  
 3 proceeded. It would be probably -- without a compass  
 4 heading -- probably east just because Lycoming Creek  
 5 Road runs north and south. So it was heading towards  
 6 the development.  
 7 Q And how far did Barasky's car travel once you  
 8 had your lights and siren on until he stopped?  
 9 A Well, it took me just a short time to catch  
 10 up to him, but he went the full four-tenths of a mile  
 11 from Lycoming Creek Road to the development. As a  
 12 matter of fact, I had radioed that he's not stopping  
 13 because he gave no indication. There was a couple  
 14 spots for him to pull over, including a couple  
 15 driveways that led back to houses, and a berm on the  
 16 road. He actually got to the development entrance,  
 17 turned onto the entrance and immediately turned back  
 18 onto the road and then stopped.  
 19 Q Okay.  
 20 A I believe that's probably when he saw the  
 21 marked car, because there's a slight hill there.  
 22 Q Now, during that time, in that four-tenths of  
 23 a mile stretch, did Mr. Barasky accelerate at a rapid  
 24 rate?  
 25 A I don't believe so, no.

1 Q Did his driving change in any way that you  
 2 can remember?  
 3 A I don't recall.  
 4 Q Okay.  
 5 A I just -- it just appeared that he was -- he  
 6 was continuing without yielding or stopping.  
 7 Q After Barasky stopped his vehicle, what  
 8 happened then?  
 9 A He stopped the vehicle sort of like on a  
 10 little bit of angle. Like I said, he came back out on  
 11 the road and the marked car was there. Immediately I  
 12 had -- I know that Gardner and Bell were on my left  
 13 side, and another car pulled up, which it was  
 14 Detective Havens.  
 15 Q Um-hum.  
 16 A They immediately got out of the car and  
 17 approached the car, shouting orders for Mr. Barasky.  
 18 I didn't have a chance to even get out of my car at  
 19 that point.  
 20 Q Did they have their firearms drawn --  
 21 A Yes.  
 22 Q -- when they approached the car?  
 23 A Yes, they did.  
 24 Q And do you remember what orders they were  
 25 shouting at him?

1 A I know it was see my hands -- want to see  
 2 your hands. Get out of the car. Open the door,  
 3 something -- to that effect. I mean, you know, it --  
 4 there was enough going on that I just at that point  
 5 stayed back because, obviously, didn't want to -- you  
 6 know, we didn't need anybody else there in cross fire  
 7 situations and stuff, so I just stayed at my car in  
 8 case I needed to get back into it for either cover or  
 9 if Mr. Barasky would take off, you know.  
 10 Q Now, did you see anybody try to break a  
 11 window on Mr. Barasky's car?  
 12 A I did not.  
 13 Q How did they get Mr. Barasky out of his car?  
 14 A The door opened.  
 15 Q Um-hum.  
 16 A Officer Bell was in front of the driver's  
 17 door at the fender.  
 18 Q Um-hum.  
 19 A And Detective Havens was behind the driver's  
 20 door, and the other side was Detective Gardner.  
 21 Q Um-hum.  
 22 A When the door opened, I saw Detective Havens  
 23 reach in, pull Mr. Barasky out, put him up against  
 24 his -- Mr. Barasky's car that he was driving, right at  
 25 the passenger -- rear -- driver's side passenger door,

1 rear door.  
 2 Q Okay.  
 3 A Okay.  
 4 Q Were you able to see if Barasky opened the  
 5 car door himself or police had to forcibly open it?  
 6 A I don't recall them forcibly opening it. I  
 7 don't know how it got open. I mean, it wasn't like  
 8 they were prying or anything on it --  
 9 Q Okay.  
 10 A -- that I saw.  
 11 Q Aside -- and then you said Detective Havens  
 12 pulled him out of the car by his arm?  
 13 A Yeah. Took him by the arm. Controlled him,  
 14 brought him out, up against the car.  
 15 Q Did it look to you like it was forcible pull  
 16 or more just guiding him? How would you describe it?  
 17 A I think it was more of a controlled, get my  
 18 hands on you, control you and get you out of the car.  
 19 They didn't throw him to the ground or nothing like  
 20 that or --  
 21 Q And you would agree like Mr. Barasky didn't  
 22 resist at that point or fight Detective Havens?  
 23 A No.  
 24 Q Did you observe Detective Havens place  
 25 handcuffs on Mr. Barasky then?

1 A I did.  
 2 Q Did you get out of your vehicle at any point  
 3 during that --  
 4 A I was out of my vehicle. I was at my door.  
 5 I didn't -- so I had -- I had the undercover that Bell  
 6 and Gardner were in.  
 7 Q Um-hum.  
 8 A I was able to open my door. I stood there.  
 9 I wasn't going to sit in my car, obviously, but I did  
 10 not approach the vehicle.  
 11 Q Did you have your firearm drawn at that  
 12 point?  
 13 A No, I did not.  
 14 Q And would that have been for essentially  
 15 safety reasons because there were police officers in  
 16 front of you?  
 17 A There was police officers in front and  
 18 they -- you know, their guns were drawn and I felt  
 19 that it was under control at that point.  
 20 Q Did you have any cause to shout orders or  
 21 anything at Mr. Barasky?  
 22 A No, sir.  
 23 Q After Mr. Barasky was in handcuffs, what  
 24 happened next?  
 25 A Well, within a minute or so, Gardner

1 actually -- or I'm sorry. Detective Bell approached  
 2 and said we were good to go.  
 3 Q Okay. And did you in that minute or so  
 4 between when Mr. Barasky was arrested, you were told  
 5 you were good to go, did you observe police search Mr.  
 6 Barasky or search of his vehicle at all?  
 7 A I think they patted him down or -- I don't  
 8 know of it was a search, a frisk incident. I don't  
 9 recall. But, yes, I believe it was trooper -- or  
 10 Trooper Havens -- I believe it was Detective Havens  
 11 that did that.  
 12 Q Okay. Did they tell you that no drugs were  
 13 found on Mr. Barasky?  
 14 A No, they did not.  
 15 Q When you were told you were free to go, what  
 16 did you do next?  
 17 A I just made sure my guys were all right,  
 18 because they were still at their vehicle.  
 19 Q Um-hum.  
 20 A They did not approach, either. Basically  
 21 we're taught if you're going to deploy the sticks, to  
 22 have a safety barrier between you and the fleeing  
 23 vehicle, whether it be guard rails. And I believe  
 24 they positioned themselves properly there.  
 25 Q Um-hum.

1 A So they both got in their car. And by then  
 2 Sergeant Kriner came driving down, because I think  
 3 there was a radio communication he was in custody  
 4 or --  
 5 Q Um-hum.  
 6 A -- or detained or something to that effect.  
 7 Because I know Sergeant Kriner arrived and that's when  
 8 we left.  
 9 Q Okay. So Officers Brown and Engel would have  
 10 left at the same time you did --  
 11 A As far as I --  
 12 Q -- roughly?  
 13 A Well, yeah. I mean, there was --  
 14 Q Within a couple minutes of each other?  
 15 A Until we got cars moved around and stuff,  
 16 yes, I believe so.  
 17 Q Did Sergeant Kriner stay at the scene or did  
 18 he leave with you guys?  
 19 A I believe he left with us, too.  
 20 Q After Barasky was arrested, you were told you  
 21 were free to leave, did you have any involvement in  
 22 the investigation or criminal charges?  
 23 A No, I did not.  
 24 Q Do you know where Mr. Barasky was taken after  
 25 he was arrested?

1 A I do not. 37

2 Q And do you know -- do you even know if his

3 vehicle was towed after he was arrested?

4 A I do not. I think they mentioned they were

5 getting a tow, but --

6 Q But you weren't there when the tow truck

7 arrived --

8 A No.

9 Q -- or anything like that?

10 A Huh-uh.

11 Q I'm going to show you a map here. Take one

12 and pass it down.

13 MR. KOZLOWSKI: Sure.

14 BY MR. GRYSKEWICZ:

15 Q Take a minute and look at it. So is this --

16 would you agree with me that this is an accurate

17 depiction of the Brentwood Drive area where the

18 vehicle stop occurred where Mr. Sumpter's house is?

19 A That is correct.

20 Q Okay. Would you agree with me that that

21 little red marker towards the bottom of the map would

22 be roughly where 416 Brentwood Drive is where Mr.

23 Sumpter lived?

24 A I would say approximately. It looks a little

25 bit -- it looks like it might be closer to that

1 intersection than it would be. It's -- I know there's 38

2 three or four houses right in here. But, yeah, that's

3 general location.

4 Q Okay.

5 A On that -- yeah, Brentwood Drive and he came

6 around and out Rick Lane.

7 Q Now, so we could see on this map, it appears

8 Miller Road goes into that development.

9 A Correct.

10 Q Is that what you were discussing earlier?

11 A That's where Mr. Barasky pulled in and then

12 immediately pulled out back onto Eckard Road. Eckard

13 Road would be that -- is it Route -- Township Route

14 128 or whatever?

15 Q I believe if you're looking, Eckard Road is

16 listed on --

17 A Oh, is it listed?

18 Q Over on this side of the map, but you have to

19 follow it all the way around.

20 A Yeah, yeah. It would be right here

21 (indicating). Yes.

22 Q Okay. I'm going to give you my pen, if you

23 don't mind, if you want to mark up the map in

24 correspondence to my questions. Could you -- could

25 you circle the area on the map about where you were

1 staged waiting for Mr. Barasky? 39

2 MR. KOZLOWSKI: What do you want him to put

3 there, an X or --

4 MR. GRYSKEWICZ: Or a circle, I think. Yeah.

5 THE WITNESS: It would probably -- let's see.

6 There's Roan's RV. This would be the lot. Probably

7 in here somewhere (indicating).

8 BY MR. GRYSKEWICZ:

9 Q And could you put an X on the map where Mr.

10 Barasky stopped his vehicle?

11 A It would have been right in here

12 (indicating).

13 Q And could you put a square on the map where

14 Officers Brown and Engel had the tack strips set up?

15 A It would have been just past.

16 Q Okay. So that -- I know that looks like it

17 might farther down the road. Is it like -- basically

18 like right beyond the intersection?

19 A Yeah, it's just beyond the intersection.

20 Right when you come here, there's just a little bit of

21 a hill and a turn. They would have been right there

22 so they were -- you could see them from where Mr.

23 Barasky stopped. So, yeah, maybe -- can I cross that

24 out and initial it?

25 Q Yeah, yeah. Please do.

1 A It would probably have been like -- probably 40

2 right in here (indicating).

3 Q Okay. And then you would agree with me on

4 this map, once Mr. Barasky turned onto Miller Road,

5 there would have been no other outlet besides Miller

6 Road from that development?

7 A That's correct. He had to circle all the way

8 back around throughout that development to get back.

9 Q Okay. And once you're on Miller Road, he

10 would have still had to make, it looks like two turns

11 to me before he would have got to Brentwood Drive?

12 A Yeah. It's actually six-tenths of a mile

13 from that intersection of Miller Road and Eckard Road

14 to Mr. -- to Mr. Sumpter's house. Yes, he would have

15 come up -- would have come up Miller to Airline.

16 Q Um-hum.

17 A Airline probably a hundred feet.

18 Q Um-hum.

19 A And then turn onto Brentwood and then go

20 around there. So he would have had to come up here,

21 turn onto Airline, then onto Brentwood to come around.

22 Q Okay. And you said that was about .6 miles?

23 A Yes. I checked it. It's .6 miles.

24 Q Okay. Could you put another X on the map

25 where you think you turned on your lights and sirens?

1 A I turned them on before I was out of the lot. 41  
 2 Q Okay. So basically where that circle is you  
 3 drew?  
 4 A Yeah. As soon as they -- as soon as they  
 5 identified the vehicle to me, I immediately turned  
 6 them on and pulled out.  
 7 Q Okay. Now, you would -- you would agree with  
 8 me that absent, you know, Officer Brown and Engel  
 9 being stationed on Eckard Road with the tack strips,  
 10 Mr. Barasky could have driven straight past Miller  
 11 Road?  
 12 A Correct.  
 13 Q And --  
 14 A That was one of the concerns, I believe, you  
 15 know, if he would have got past that.  
 16 Q And you would agree with me, you don't know  
 17 if Mr. Barasky was turning onto Miller Road to go to  
 18 Brentwood Drive or if he made that loop because he saw  
 19 Officer Brown and Engel?  
 20 A I do not know.  
 21 Q And you would agree with me if he went  
 22 straight past Miller Road, there's, you know, a  
 23 multitude of areas he could have went to?  
 24 A Yes. He did put his turn signal on for  
 25 Miller Road, though.

1 Q Okay. And did he have his turn signal on 42  
 2 after you were already behind him with your lights and  
 3 sirens?  
 4 A No.  
 5 Q So --  
 6 A Not until we got to Miller Road.  
 7 Q Okay.  
 8 A As I said, he gave no indication that he was  
 9 going to pull over or anything. I actually radioed my  
 10 concerns that he's not stopping, and he put his turn  
 11 signal on for Miller Road. So as you started to turn,  
 12 he then turned back out into the road.  
 13 Q Okay. So, yeah, maybe I poorly worded that  
 14 question. So you -- you would have been behind him  
 15 with your lights and sirens on when the turn signal  
 16 was actually activated?  
 17 A Yes.  
 18 Q Okay. So -- but you followed him for, you  
 19 know, a certain distance before that turn signal was  
 20 activated as well with your lights and sirens?  
 21 A Yes.  
 22 MR. GRYSKEWICZ: Okay. I would just mark  
 23 that map as Plaintiff's Exhibit 1 and have it attached  
 24 to the transcript.  
 25 (Whereupon, a document was produced and

1 marked as Plaintiff's Exhibit No. 1 for 43  
 2 identification.)  
 3 MS. LAUGHLIN: Can I see that, please?  
 4 MR. GRYSKEWICZ: Yeah. Absolutely.  
 5 THE WITNESS: Sorry about the scribbling. Do  
 6 you want me to sign it or anything?  
 7 MR. GRYSKEWICZ: I don't think you have to  
 8 sign it. I think the transcript will be clear you  
 9 wrote on it.  
 10 THE WITNESS: Okay.  
 11 MS. LAUGHLIN: Thank you.  
 12 BY MR. GRYSKEWICZ:  
 13 Q Now, as part of -- Chief Hope, you saw me  
 14 write. I wrote Plaintiff Exhibit 1 on the top of  
 15 that. Right? You didn't write that, right? I did?  
 16 A Correct. Yeah.  
 17 Q How many arrests do you believe you made in  
 18 your career as a police officer?  
 19 A Few hundred.  
 20 Q Were some of those for drug crimes?  
 21 A Yeah. If I was on patrol and, you know,  
 22 stopped a vehicle and had drugs on them or -- but, you  
 23 know, usually if it -- if it was a drug arrest, it was  
 24 something like that. You know, a stop of somebody and  
 25 found drugs on them or -- a vehicle stop, something

1 like that. Yes. Nothing really involved with search 44  
 2 warrants, and that was a lot bigger and others handled  
 3 that.  
 4 Q And you said previously you didn't really use  
 5 informants much in your career?  
 6 A No, I did not.  
 7 Q Are you familiar with criminal use of a  
 8 communication facility charge under Section 7512 of  
 9 the Crimes Code?  
 10 A I'm aware of it, yes.  
 11 Q Have you ever charged that in your career?  
 12 A No, I haven't.  
 13 Q Okay. Have you ever charged somebody with  
 14 the attempted delivery of a controlled substance in  
 15 your career?  
 16 A No, I have not.  
 17 Q Now, as part of your training and experience  
 18 as a police officer, when another department or  
 19 officer tells you they need assistance with your  
 20 arrest -- or with their arrest, what are you trained  
 21 to do in response?  
 22 A I'm not sure I understand your question.  
 23 Q Yeah. That's fine. It's probably poorly  
 24 worded. So if, for example, another police department  
 25 contacted you for assistance in their investigation

1 with making an arrest, what does your training tell  
 2 you you should do in response to that?  
 3 A In their investigation?  
 4 Q Um-hum.  
 5 A Or just to assist them? Basically --  
 6 Q Let's say -- let me just completely reword  
 7 the question --  
 8 A Yeah.  
 9 Q -- because I can see how that would be  
 10 confusing to you. So if another police department  
 11 contacted you for assistance, what are you trained to  
 12 do in response?  
 13 A Basically to do a briefing, like we did, and  
 14 see what -- what they -- first of all, what they want  
 15 from us --  
 16 Q Um-hum.  
 17 A -- and if we can provide that.  
 18 Q As part of that, do you make an analysis of  
 19 whether, you know, your conduct is in correspondence  
 20 with the law?  
 21 A Yes.  
 22 Q In 2020 was the chief of police your only  
 23 job?  
 24 A Yes.  
 25 Q What was your annual pay from your job as

1 chief of police in 2020?  
 2 A 2020. I retired in '21. Like 65,000.  
 3 MR. GRYSKEWICZ: That's all the questions I  
 4 have. Thank you, Chief.  
 5 THE WITNESS: Um-hum.  
 6 MR. GRYSKEWICZ: I appreciate your  
 7 cooperation.  
 8 THE WITNESS: Yep.  
 9 CROSS-EXAMINATION  
 10 BY MS. LAUGHLIN:  
 11 Q Chief, I just had a couple of questions. My  
 12 name is Shawna Laughlin and I represent the City,  
 13 Captain Bell and Officer Gardner. The development  
 14 where Sumpter lived, was there only one way in and one  
 15 way out?  
 16 A Yes. Yes, yes, yes. It just circled around  
 17 the development. Miller Road was the only access in  
 18 off of Eckard.  
 19 Q And the stop strip, did the other officers  
 20 actually have that out on the road --  
 21 A No, sir.  
 22 Q -- are it was just there in case it was  
 23 needed?  
 24 A No, ma'am. They just had it there. They did  
 25 not have them deployed. No. They never deployed

1 them.  
 2 MS. LAUGHLIN: Thank you. That's all the  
 3 questions I have.  
 4 MR. WHITE: I don't have any questions.  
 5 MR. KOZLOWSKI: I don't have any questions,  
 6 either. Anybody else?  
 7 MR. GRYSKEWICZ: I have one follow-up  
 8 question --  
 9 MR. KOZLOWSKI: Sure.  
 10 MR. GRYSKEWICZ: -- based on Attorney  
 11 Laughlin's question.  
 12 REDIRECT EXAMINATION  
 13 BY MR. GRYSKEWICZ:  
 14 Q When Officer Brown and Engel were stationed  
 15 there, did they have their police vehicle blocking the  
 16 road?  
 17 A No.  
 18 Q Okay.  
 19 A It was beside the road that they can maintain  
 20 behind it. It was -- that's hard to tell even on a  
 21 map.  
 22 Q Um-hum.  
 23 A But there was enough area there that they had  
 24 it parked and then they were behind it, because there  
 25 was no guide rail right there. There is a guard rail

1 on Miller, but not there on Eckard at that point. So  
 2 they had it there that they could deploy them but  
 3 still had the coverage of their -- I know there was a  
 4 steep back there, too, so -- but, no, it was not  
 5 blocking the road at all.  
 6 Q So if they were told they had to deploy it,  
 7 they could have deployed it and hid, essentially?  
 8 A Correct. We -- we don't block roads.  
 9 Q Okay.  
 10 A We don't block roads. I mean, that's just  
 11 common. You know, you don't block a road. You're  
 12 just creating more of an issue by blocking a road.  
 13 So, you know, you give them a means -- I don't want to  
 14 say -- not really a means of escape, but you do give  
 15 him that thoroughfare there that they can, but we had  
 16 the stop sticks to be deployed in case he tried.  
 17 MR. GRYSKEWICZ: That's the only question I  
 18 had. Thank you.  
 19 MS. LAUGHLIN: Nothing.  
 20 MR. KOZLOWSKI: All right. We're all set.  
 21 (Whereupon, the deposition was concluded at  
 22 9:58 a.m.)  
 23  
 24  
 25

1 COUNTY OF UNION :

2 COMMONWEALTH OF PENNSYLVANIA

3

4 I, Ervin S. Blank, the undersigned Notary  
5 Public, do hereby certify that personally appeared  
6 before me, JOSEPH W. HOPE; the witness, being by me  
7 first duly sworn to testify the truth, the whole truth  
8 and nothing but the truth, in answer to the oral  
9 questions propounded to him by the attorneys for the  
10 respective parties, testified as set forth in the  
11 foregoing deposition.

12 I further certify that before the taking of  
13 said deposition, the above witness was duly sworn,  
14 that the questions and answers were taken down  
15 stenographically by the said Ervin S. Blank, Court  
16 Reporter, Lewisburg, Pennsylvania, approved and agreed  
17 to, and afterwards reduced to typewriting under the  
18 direction of the said Reporter.

19 In testimony whereof, I have hereunto  
20 subscribed my hand this 27th day of March, 2024.

21

22

23

Ervin S. Blank  
Reporter-Notary Public  
My Commission Expires  
January 28, 2025

24

25

---

**- 0 -**

**06104-2903** [1]  
2:6

---

**- 1 -**

**17701** [1] 2:3  
**18507** [1] 2:10  
**18701** [1] 1:24

---

**- 2 -**

**2016** [1] 25:16  
**2020** [12] 5:10,  
21; 6:11, 15;  
7:9; 8:3, 4, 20;  
9:18; 45:22;  
46:1, 2  
**2021** [2] 5:15,  
16  
**2024** [2] 1:16;  
49:20  
**2025** [1] 49:25  
**21-cv-02041** [1]  
1:6  
**27th** [1] 49:20  
**2903** [1] 2:6

---

**- 3 -**

**3118** [1] 2:9  
**31st** [1] 5:15

---

**- 6 -**

**65,000** [1] 46:2

---

**- 7 -**

**7512** [1] 44:8

---

**- A -**

**a.m.** [2] 1:16;  
48:22  
**able** [4] 26:18;  
33:4; 34:8

**above** [1]  
49:13  
**absent** [1]  
41:8  
**absolutely** [2]  
13:23; 43:4  
**accelerate** [1]  
30:23  
**acceptable** [1]  
4:23  
**access** [2]  
13:11; 46:17  
**accurate** [2]  
22:1; 37:16  
**accusation** [1]  
24:19  
**activated** [2]  
42:16, 20  
**addict** [1]  
17:13  
**admitted** [1]  
3:14  
**advised** [1]  
11:22  
**affirmed** [1]  
4:11  
**afterwards** [1]  
49:17  
**again** [4]  
13:22; 20:10;  
22:20; 29:8  
**against** [2]  
32:23; 33:14  
**agency** [1]  
8:14  
**agree** [9] 6:20;  
26:23; 33:21;  
37:16, 20;  
40:3; 41:7, 16,  
21  
**agreed** [1]  
49:16  
**airline** [3]  
40:15, 17, 21  
**alleged** [1]  
14:16  
**alls** [1] 13:21  
**almost** [2]  
12:25; 23:13

**along** [2]  
27:19  
**always** [3] 6:4;  
17:11, 12  
**analysis** [1]  
45:18  
**angle** [1] 31:10  
**annual** [1]  
45:25  
**answer** [6]  
4:22, 23; 7:3,  
11; 24:11;  
49:8  
**answers** [1]  
49:14  
**anthony** [17]  
1:2; 7:25;  
10:5; 14:2;  
17:24; 18:5;  
19:7; 20:25;  
22:25; 23:22;  
24:1, 9, 18;  
26:4, 15, 25;  
28:20  
**anthony's** [1]  
25:21  
**anyhow** [1]  
14:12  
**appeared** [2]  
31:5; 49:5  
**appreciate** [1]  
46:6  
**approach** [2]  
34:10; 35:20  
**approached**  
[10] 7:13;  
9:11, 14;  
10:11, 14, 18;  
17:14; 31:17,  
22; 35:1  
**approved** [1]  
49:16  
**area** [9] 7:9;  
14:24; 19:9;  
25:5; 26:5;  
27:18; 37:17;  
38:25; 47:23  
**areas** [1] 41:23  
**arrest** [7]  
7:21; 11:24;

18:5; 43:23;  
44:20; 45:1  
**arrested** [4]  
35:4; 36:20,  
25; 37:3  
**arresting** [3]  
17:6, 24; 20:25  
**arrests** [5]  
12:10; 16:23;  
17:3; 21:13;  
43:17  
**arrived** [2]  
36:7; 37:7  
**arriving** [1]  
18:16  
**artery** [1]  
12:21  
**aside** [1] 33:11  
**assist** [4]  
7:23; 10:23;  
21:22; 45:5  
**assistance** [13]  
6:21, 22; 8:8,  
17, 18; 9:12;  
10:12, 16;  
20:24; 44:19,  
25; 45:11  
**associates** [1]  
2:5  
**attached** [1]  
42:23  
**attempt** [2]  
20:4, 19  
**attempted** [1]  
44:14  
**attempting** [1]  
11:24  
**attorney** [3]  
4:18; 22:12;  
47:10  
**attorneys** [1]  
49:9  
**austin** [1] 2:2  
**aware** [3]  
16:21; 17:1;  
44:10  
**away** [1] 25:2

---

**- B -**



<p><b>barasky</b> [54] 1:2; 10:5, 22; 11:25; 12:8, 14, 16; 13:3, 16; 14:2, 5, 6, 25; 17:18, 24; 18:1, 16; 19:14; 20:9, 23, 25; 22:25; 23:12; 24:1, 9; 27:3, 22; 28:9, 12, 20; 29:1; 30:23; 31:7, 17; 32:9, 13, 23; 33:4, 21, 25; 34:21, 23; 35:4, 6, 13; 36:20, 24; 38:11; 39:1, 10, 23; 40:4; 41:10, 17 <b>barasky's</b> [11] 7:25; 18:5; 23:15, 22; 24:18; 26:4, 16, 25; 30:7; 32:11, 24 <b>barrier</b> [1] 35:22 <b>based</b> [1] 47:10 <b>basis</b> [1] 8:5 <b>beginning</b> [1] 1:16 <b>behind</b> [9] 26:12; 28:6; 29:24; 30:2; 32:19; 42:2, 14; 47:20, 24 <b>bell</b> [35] 1:6; 2:7; 7:16; 9:9; 10:10, 13, 15; 11:8, 20, 22; 12:6; 13:15, 25; 14:8; 16:12, 19; 17:22; 18:6, 9, 20, 21; 19:6; 23:10; 25:20; 26:7; 27:20;</p>	<p>29:9, 18; 30:1; 31:12; 32:16; 34:5; 35:1; 46:13 <b>belonged</b> [1] 19:21 <b>berm</b> [1] 30:15 <b>beside</b> [1] 47:19 <b>best</b> [1] 9:22 <b>between</b> [9] 4:2; 13:15; 14:1; 22:15, 24; 24:9; 28:17; 35:4, 22 <b>beyond</b> [2] 39:18, 19 <b>bigger</b> [1] 44:2 <b>blank</b> [4] 1:15; 49:4, 15, 23 <b>block</b> [3] 48:8, 10, 11 <b>blocking</b> [3] 47:15; 48:5, 12 <b>blood</b> [1] 6:5 <b>bottom</b> [1] 37:21 <b>break</b> [2] 4:23; 32:10 <b>breaking</b> [1] 17:9 <b>brentwood</b> [11] 12:2, 5; 15:11, 20; 37:17, 22; 38:5; 40:11, 19, 21; 41:18 <b>briefing</b> [19] 8:24; 10:6, 20, 24; 11:3, 4, 10, 19, 21; 16:5, 14; 17:16, 23; 18:3, 4; 19:5; 26:24; 45:13 <b>brought</b> [3] 11:7; 24:23; 33:14 <b>brown</b> [10] 11:6, 14, 15; 20:18; 28:1;</p>	<p>36:9; 39:14; 41:8, 19; 47:14 <b>building</b> [1] 12:18 <b>businesses</b> [1] 12:23 <b>buys</b> [6] 12:7; 13:15, 19; 14:1, 13; 16:16 <hr/><p style="text-align: center;">- C - <hr/></p><p><b>calls</b> [1] 24:8 <b>captain</b> [1] 46:13 <b>career</b> [5] 21:6; 43:18; 44:5, 11, 15 <b>carried</b> [1] 20:12 <b>cars</b> [4] 15:23; 17:9; 20:8; 36:15 <b>case</b> [11] 1:6; 7:25; 10:1, 22; 12:3; 20:19, 22; 22:12; 32:8; 46:22; 48:16 <b>catch</b> [1] 30:9 <b>central</b> [2] 5:7; 6:9 <b>certain</b> [1] 42:19 <b>certification</b> [1] 4:4 <b>certified</b> [1] 21:18 <b>certify</b> [2] 49:5, 12 <b>cetera</b> [2] 12:25; 13:20 <b>chance</b> [1] 31:18 <b>change</b> [1] 31:1 <b>charge</b> [1] 44:8 <b>charged</b> [2] 44:11, 13</p> </p>	<p><b>charges</b> [2] 26:1; 36:22 <b>checked</b> [1] 40:23 <b>chief</b> [11] 4:14; 5:11, 13, 17, 20; 6:3; 43:13; 45:22; 46:1, 4, 11 <b>christopher</b> [3] 1:7; 2:11; 19:3 <b>circle</b> [4] 38:25; 39:4; 40:7; 41:2 <b>circled</b> [1] 46:16 <b>city</b> [4] 1:9; 2:7; 12:22; 46:12 <b>clarify</b> [1] 22:7 <b>clear</b> [1] 43:8 <b>clinton</b> [3] 1:6; 2:7; 18:24 <b>close</b> [1] 20:24 <b>closer</b> [1] 37:25 <b>code</b> [1] 44:9 <b>coming</b> [1] 21:13 <b>commission</b> [1] 49:24 <b>commit</b> [1] 20:1 <b>common</b> [4] 15:14, 15; 48:11 <b>commonwealth</b> [1] 49:2 <b>communicating</b> [1] 16:8 <b>communication</b> [4] 28:13; 29:22; 36:3; 44:8 <b>compass</b> [1] 30:3 <b>completely</b> [1] 45:6</p>
--	---	--	---

**concern** [2]  
20:15; 27:11  
**concerned** [4]  
12:16; 13:2, 3;  
18:6  
**concerns** [3]  
12:11; 41:14;  
42:10  
**concluded** [1]  
48:21  
**conduct** [1]  
45:19  
**conducting** [1]  
9:4  
**confidential** [2]  
22:16, 25  
**confusing** [1]  
45:10  
**connecticut** [1]  
2:6  
**consensus** [1]  
28:2  
**consider** [1]  
6:1  
**consisted** [1]  
8:25  
**consistent** [1]  
29:13  
**contact** [3]  
10:13; 14:5;  
17:25  
**contacted** [3]  
9:9; 44:25;  
45:11  
**continue** [1]  
20:16  
**continued** [1]  
2:1  
**continuing** [1]  
31:6  
**contracted** [1]  
12:1  
**control** [2]  
33:18; 34:19  
**controlled** [10]  
7:21, 22;  
11:23, 24;  
14:9; 22:17;  
23:2; 33:13,  
17; 44:14

**convictions** [1]  
12:10  
**cooperation** [1]  
46:7  
**copy** [1] 25:21  
**correct** [16]  
7:6; 13:17;  
14:22; 16:3;  
19:1, 4; 24:7,  
15, 20; 25:22;  
37:19; 38:9;  
40:7; 41:12;  
43:16; 48:8  
**correspondenc**  
**e** [2] 38:24;  
45:19  
**corroborating**  
[2] 22:17;  
23:1  
**counsel** [3]  
1:22; 2:1; 4:3  
**county** [8] 1:8;  
5:7; 6:13, 19;  
7:4; 8:9;  
28:20; 49:1  
**couple** [4]  
30:13, 14;  
36:14; 46:11  
**court** [2] 1:1;  
49:15  
**cover** [1] 32:8  
**coverage** [1]  
48:3  
**crashed** [2]  
12:17; 25:3  
**crashes** [1]  
25:7  
**create** [2]  
20:20; 26:24  
**creating** [1]  
48:12  
**creek** [15]  
12:19; 14:20;  
19:13, 20;  
20:2, 6; 26:15,  
20, 22; 27:12,  
21; 28:20;  
29:12; 30:4, 11  
**crimes** [2]  
43:20; 44:9

**criminal** [8]  
12:9, 10;  
16:20; 17:1;  
24:18; 25:21;  
36:22; 44:7  
**cross** [3] 3:2;  
32:6; 39:23  
**cross-examinat**  
**ion** [1] 46:9  
**custody** [1]  
36:3

---

- D -

**daily** [1] 8:5  
**date** [1] 8:19  
**deal** [3] 18:15;  
23:18; 25:5  
**deem** [1] 6:8  
**defendants** [4]  
1:9; 2:4, 7, 10  
**deliver** [1]  
14:6  
**delivery** [2]  
12:11; 44:14  
**dennehey** [1]  
2:9  
**dent** [6] 1:6;  
2:4; 11:9;  
16:5; 17:22;  
18:1  
**department**  
[16] 5:12, 18;  
6:12; 7:8; 8:3,  
11, 22; 9:2,  
23; 10:12;  
11:2, 13;  
21:15; 44:18,  
24; 45:10  
**depiction** [1]  
37:17  
**deploy** [3]  
35:21; 48:2, 6  
**deployed** [4]  
46:25; 48:7, 16  
**deposed** [1]  
4:14  
**deposition** [4]  
1:13; 48:21;  
49:11, 13

**describe** [5]  
7:7; 8:17;  
13:18, 25;  
33:16  
**describing** [1]  
14:19  
**details** [2]  
22:17; 23:2  
**detained** [1]  
36:6  
**detective** [37]  
7:15; 9:9;  
10:10, 15;  
11:7, 8, 9, 20,  
22; 12:6;  
13:15, 25;  
14:8; 16:5, 12,  
19; 17:22, 25;  
18:6, 11, 12,  
20, 24; 25:20;  
26:7, 8; 27:19;  
31:14; 32:19,  
20, 22; 33:11,  
22, 24; 35:1,  
10  
**develop** [1]  
15:14  
**development**  
[32] 12:2, 4,  
14; 13:8, 13;  
14:7; 15:3, 8,  
11, 14, 16, 19;  
16:18; 19:19;  
20:2, 5, 7, 16,  
17; 27:10, 23,  
25; 28:2;  
29:15; 30:6,  
11, 16; 38:8;  
40:6, 8; 46:13,  
17  
**different** [1]  
26:11  
**direct** [2] 3:2;  
4:12  
**direction** [1]  
49:18  
**directly** [2]  
17:25; 26:12  
**discuss** [2]  
18:4; 20:10

**discussed** [1]

28:13

**discussing** [1]

38:10

**distance** [2]

27:24; 42:19

**district** [2] 1:1**document** [1]

42:25

**doesn't** [1]

22:6

**door** [10] 32:2,

14, 17, 20, 22,

25; 33:1, 5;

34:4, 8

**down** [5] 35:7;

36:2; 37:12;

39:17; 49:14

**drawn** [3]

31:20; 34:11,

18

**drew** [1] 41:3**drive** [9] 12:3,

5; 15:11, 20;

37:17, 22;

38:5; 40:11;

41:18

**driven** [1]

41:10

**driver's** [3]

32:16, 19, 25

**driveways** [2]

13:11; 30:15

**driving** [3]

31:1; 32:24;

36:2

**drug** [9] 12:10;

17:8, 13; 21:7,

12, 23; 26:1;

43:20, 23

**drugs** [7] 14:6;

16:17; 17:14;

23:18; 35:12;

43:22, 25

**duly** [3] 4:11;

49:7, 13

**during** [5]

12:18; 16:9;

30:22; 34:3

---

**- E -****east** [1] 30:4**eckard** [11]

19:18, 20;

20:7; 29:14;

38:12, 15;

40:13; 41:9;

46:18; 48:1

**effect** [3]

23:19; 32:3;

36:6

**either** [3]

32:8; 35:20;

47:6

**employed** [3]

5:6, 10; 6:6

**enforcement**

[2] 6:13; 7:4

**engel** [11]

11:6, 11, 14,

15; 20:18;

28:1; 36:9;

39:14; 41:8,

19; 47:14

**entrance** [3]

20:17; 30:16,

17

**ervin** [4] 1:15;

49:4, 15, 23

**escape** [1]

48:14

**esquire** [4]

1:23; 2:2, 5, 8

**essentially** [2]

34:14; 48:7

**estimate** [1]

28:16

**everybody** [1]

15:6

**exact** [1] 23:13**exactly** [1]

23:19

**examination** [3]

3:3; 4:12;

47:12

**example** [1]

44:24

**except** [1] 4:5**execute** [1]

26:5

**exhibit** [4]

3:15; 42:23;

43:1, 14

**exhibits** [1]

3:13

**experience** [3]

21:5, 24; 44:17

**expertise** [1]

27:16

**expires** [1]

49:24

**extensive** [1]

21:5

**extent** [1] 17:2**extra** [1] 9:3

---

**- F -****facility** [1]

44:8

**fact** [3] 19:14;

28:7; 30:12

**familiar** [4]

12:20; 16:22;

17:7; 44:7

**farther** [1]

39:17

**federal** [1]

21:12

**feet** [2] 19:19;

40:17

**felt** [2] 19:24;

34:18

**fender** [1]

32:17

**ferren** [1] 2:5**field** [1] 24:3**fight** [1] 33:22**filing** [1] 4:4**filling** [1]

22:11

**fine** [3] 25:17;

28:16; 44:23

**finish** [2] 6:24;

7:3

**fire** [4] 21:18,

20; 32:6

**firearm** [1]

34:11

**firearms** [1]

31:20

**firm** [2] 1:17;

2:2

**first** [8] 10:4,

11; 18:2;

19:25; 28:22;

45:14; 49:7

**five** [1] 5:19**fled** [3] 12:17;

25:9, 12

**flee** [2] 20:19,

23

**fleeing** [7]

15:5; 18:9;

20:15; 24:19,

22; 27:10;

35:22

**follow** [2]

19:16; 38:19

**follow-up** [1]

47:7

**followed** [1]

42:18

**follows** [1]

4:11

**foot** [1] 25:10**forcible** [1]

33:15

**forcibly** [2]

33:5, 6

**foregoing** [1]

49:11

**form** [2] 4:5;

7:10

**forth** [1] 49:10**found** [3]

27:20; 35:13;

43:25

**four** [3] 5:21;

20:6; 38:2

**four-lane** [3]

12:21; 14:22,

23

**four-tenths** [2]

30:10, 22

**fourth** [2]

1:18; 2:3

**free** [2] 35:15;  
36:21  
**frequently** [1]  
13:19  
**frisk** [1] 35:8  
**front** [5]  
12:15; 17:11;  
32:16; 34:16,  
17  
**full** [2] 12:25;  
30:10

---

- G -

**gardner** [19]  
1:7; 2:7; 11:8;  
18:12, 23, 24,  
25; 19:6;  
23:11; 26:8;  
27:20; 29:9,  
18; 30:1;  
31:12; 32:20;  
34:6, 25; 46:13  
**general** [8]  
4:18; 7:24;  
8:1, 20; 16:15;  
27:8; 28:2;  
38:3  
**generally** [2]  
8:7, 18  
**goes** [1] 38:8  
**good** [2] 35:2,  
5  
**gravel** [6]  
19:21; 23:4;  
26:4; 27:20;  
28:8, 12  
**ground** [1]  
33:19  
**gryskewicz** [17]  
1:23; 3:4;  
4:13; 7:18;  
37:14; 39:4;  
42:22; 43:4, 7,  
12; 46:3, 6;  
47:7, 10, 13;  
48:17  
**guard** [2]  
35:23; 47:25

**guess** [4]  
10:10; 24:4;  
25:4; 28:17  
**guide** [1]  
47:25  
**guiding** [1]  
33:16  
**guns** [1] 34:18  
**guys** [3] 23:9;  
35:17; 36:18

---

- H -

**h-o-p-e** [1] 5:5  
**habit** [1] 17:8  
**half** [1] 13:12  
**hand** [1] 49:20  
**handcuffs** [2]  
33:25; 34:23  
**handled** [1]  
44:2  
**hands** [3]  
32:1, 2; 33:18  
**happening** [1]  
25:12  
**hard** [1] 47:20  
**hartford** [1]  
2:6  
**hate** [1] 28:14  
**havens** [17]  
1:6; 2:4; 11:8;  
19:10, 11;  
26:14; 28:19;  
29:8, 10;  
31:14; 32:19,  
22; 33:11, 22,  
24; 35:10  
**head** [1] 20:1  
**heading** [3]  
27:23; 30:4, 5  
**heard** [3] 4:19;  
18:2; 29:22  
**help** [1] 8:21  
**hepburn** [1]  
12:1  
**hereby** [3] 4:2,  
4; 49:5  
**hereunto** [1]  
49:19

**heroin** [3]  
14:5; 22:18;  
23:2  
**hill** [2] 30:21;  
39:21  
**himself** [1]  
33:5  
**history** [5]  
12:9, 10;  
16:20; 18:8;  
25:21  
**homes** [1]  
12:24  
**hope** [11] 1:7,  
13; 2:11; 3:2;  
4:10, 14; 5:4;  
11:11; 43:13;  
49:6  
**house** [4]  
12:15, 19;  
37:18; 40:14  
**houses** [3]  
15:16; 30:15;  
38:2  
**housing** [1]  
12:2  
**hundred** [3]  
19:19; 40:17;  
43:19

---

- I -

**ideas** [1] 27:6  
**identification**  
[1] 43:2  
**identified** [2]  
12:3; 41:5  
**identify** [1]  
26:18  
**identifying** [1]  
23:22  
**immediately** [6]  
30:1, 17;  
31:11, 16;  
38:12; 41:5  
**important** [1]  
21:25  
**incident** [3]  
8:25; 35:8

**including** [1]  
30:14  
**index** [2] 3:1,  
13  
**indicating** [4]  
38:21; 39:7,  
12; 40:2  
**indication** [2]  
30:13; 42:8  
**informant** [5]  
21:2; 22:1, 16;  
23:1; 24:9  
**informants** [3]  
21:6, 10; 44:5  
**information** [4]  
12:7; 16:13;  
22:2; 26:19  
**informed** [4]  
22:15, 24;  
24:17; 29:16  
**initial** [1]  
39:24  
**inside** [2]  
15:11, 19  
**inspired** [1]  
21:21  
**instance** [1]  
21:18  
**instructions** [1]  
4:18  
**intercept** [2]  
18:17; 20:23  
**interrogatories**  
[1] 22:11  
**interrogatory**  
[2] 22:14, 23  
**intersection** [4]  
38:1; 39:18,  
19; 40:13  
**investigation**  
[8] 9:19, 21,  
25; 17:18;  
18:1; 36:22;  
44:25; 45:3  
**investigations**  
[6] 9:4, 5;  
17:8; 21:7, 12,  
23

**investigator** [3]  
17:17, 19;  
21:19  
**involved** [6]  
11:9; 16:24;  
17:5; 21:23;  
25:11; 44:1  
**involvement** [3]  
9:19, 24; 36:21  
**issue** [4]  
15:18; 17:12,  
13; 48:12  
**issues** [2]  
15:13; 20:21

---

- J -

**j-o-s-e-p-h** [1]  
5:4  
**january** [1]  
49:25  
**joseph** [7] 1:7,  
13; 2:11; 3:2;  
4:10; 5:4;  
49:6  
**joshua** [3] 1:6;  
2:7; 18:21  
**jurisdiction** [7]  
7:22; 8:8;  
9:13; 10:16;  
11:25; 25:2;  
27:6

---

- K -

**keep** [1] 18:10  
**kevin** [2] 1:6;  
2:4  
**kind** [1] 20:24  
**kmart** [2] 25:3,  
8  
**knew** [5] 13:7;  
14:1; 23:25;  
24:6, 18  
**knowledge** [1]  
9:22  
**kozlowski** [7]  
2:8; 7:10;  
37:13; 39:2;  
47:5, 9; 48:20

**kriner** [16]  
1:7; 2:11;  
7:12; 9:9, 14;  
10:11, 14, 18;  
11:5; 16:25;  
19:3; 20:21;  
36:2, 7, 17

---

- L -

**lampman** [1]  
1:23  
**lane** [2] 15:23;  
38:6  
**language** [1]  
23:14  
**last** [1] 14:16  
**laughlin** [8]  
2:5; 3:5; 43:3,  
11; 46:10, 12;  
47:2; 48:19  
**laughlin's** [1]  
47:11  
**lead** [2] 17:17,  
19  
**leading** [2]  
11:19; 17:22  
**leads** [2]  
12:22; 19:18  
**learn** [1] 21:25  
**learned** [1]  
10:4  
**leave** [2]  
36:18, 21  
**left** [4] 31:12;  
36:8, 10, 19  
**lended** [1]  
27:15  
**length** [1]  
12:25  
**leonard** [1]  
1:23  
**lewisburg** [1]  
49:16  
**lights** [6] 30:2,  
8; 40:25;  
42:2, 15, 20  
**likely** [1]  
27:23

**lines** [2]  
15:20; 16:1  
**listed** [4]  
25:23, 24;  
38:16, 17  
**lived** [3]  
15:12; 37:23;  
46:14  
**lives** [1] 12:4  
**local** [2]  
21:12; 27:15  
**located** [3]  
11:25; 19:20;  
26:14  
**location** [13]  
12:12, 13;  
13:4; 18:13,  
16; 19:17;  
20:9; 26:3;  
27:10, 16;  
29:10, 23; 38:3  
**look** [2] 33:15;  
37:15  
**looking** [1]  
38:15  
**looks** [4]  
37:24, 25;  
39:16; 40:10  
**loop** [1] 41:18  
**lots** [1] 25:9  
**lycoming** [37]  
1:8; 2:10; 5:7,  
11, 14, 18;  
6:12, 13, 18;  
7:4, 8; 8:2, 9,  
10; 9:6; 11:1,  
12; 12:19;  
14:20; 16:23;  
19:13, 20;  
20:2, 6; 21:14;  
26:15, 20, 22;  
27:12, 21;  
28:20; 29:12;  
30:4, 11

---

- M -

**ma'am** [1]  
46:24  
**main** [1] 12:21

**maintain** [1]  
47:19  
**managed** [1]  
27:14  
**manpower** [1]  
9:3  
**march** [3]  
1:16; 5:15;  
49:20  
**mark** [3] 2:8;  
38:23; 42:22  
**marked** [6]  
3:14; 20:17;  
28:4; 30:21;  
31:11; 43:1  
**marker** [1]  
37:21  
**marshall** [1]  
2:9  
**matter** [1]  
30:12  
**matthew** [10]  
9:20, 25; 12:4;  
14:2, 10;  
16:19; 17:1, 6;  
21:1; 23:1  
**mccormick** [2]  
1:17; 2:2  
**mean** [11] 6:5;  
15:13; 17:2;  
18:21; 23:19;  
24:2; 27:5;  
32:3; 33:7;  
36:13; 48:10  
**means** [2]  
48:13, 14  
**members** [1]  
11:12  
**mentioned** [1]  
37:4  
**middle** [1] 1:1  
**might** [3] 13:6;  
37:25; 39:17  
**mile** [5] 13:12;  
20:6; 30:10,  
23; 40:12  
**miles** [2]  
40:22, 23  
**miller** [14]  
38:8; 40:4, 5,

9, 13, 15;  
41:10, 17, 22,  
25; 42:6, 11;  
46:17; 48:1  
**mind** [1] 38:23  
**minute** [3]  
34:25; 35:3;  
37:15  
**minutes** [1]  
36:14  
**months** [2]  
5:25  
**moosic** [1]  
2:10  
**most** [1] 13:10  
**moved** [1]  
36:15  
**multiple** [1]  
12:23  
**multitude** [1]  
41:23

---

- N -

**name** [2] 5:2;  
46:12  
**names** [1]  
18:19  
**narcotic** [1]  
11:23  
**narcotics** [3]  
6:13, 19; 7:4  
**narrow** [1]  
16:2  
**necessarily** [1]  
7:25  
**need** [5] 4:23;  
6:24; 8:21;  
32:6; 44:19  
**needed** [3]  
20:24; 32:8;  
46:23  
**neighborhood**  
[2] 17:9, 11  
**neu's** [3] 9:19,  
21; 10:1  
**never** [2]  
17:12; 46:25  
**next** [2] 34:24;  
35:16

**normally** [2]  
8:22, 24  
**north** [3]  
12:22; 29:12;  
30:5  
**notary** [1] 49:4  
**nothing** [4]  
33:19; 44:1;  
48:19; 49:8  
**notification** [1]  
28:22  
**notified** [3]  
23:6, 7; 29:7  
**notify** [2] 8:14;  
19:14

---

- O -

**object** [1] 7:10  
**objections** [1]  
4:5  
**observe** [2]  
33:24; 35:5  
**observed** [2]  
14:10; 28:20  
**obviously** [5]  
12:20; 18:7;  
27:5; 32:5;  
34:9  
**occurred** [2]  
14:17; 37:18  
**occurs** [1]  
16:17  
**october** [13]  
5:10, 21; 6:11,  
15; 7:9, 15;  
9:8, 18, 24;  
10:7, 8; 17:16,  
24  
**offering** [1]  
8:16  
**officer** [33]  
5:23; 6:2, 9;  
9:9, 14; 10:10,  
13, 17; 11:5,  
6; 16:25;  
17:21, 22;  
18:9, 10, 11,  
23; 19:2, 10;  
20:18; 21:4;

25:20; 26:7;  
27:19; 32:16;  
41:8, 19;  
43:18; 44:18,  
19; 46:13;  
47:14  
**officers** [14]  
11:11; 15:5;  
16:8; 20:18;  
21:15; 23:21;  
24:17; 26:23;  
28:1; 34:15,  
17; 36:9;  
39:14; 46:19  
**often** [3] 7:5;  
8:1; 14:13  
**once** [5] 25:11;  
26:4; 30:7;  
40:4, 9  
**onto** [11]  
19:17; 20:1;  
27:22; 30:17,  
18; 38:12;  
40:4, 19, 21;  
41:17  
**open** [4] 32:2;  
33:5, 7; 34:8  
**opened** [3]  
32:14, 22; 33:4  
**opening** [1]  
33:6  
**opportunity** [1]  
20:3  
**oral** [1] 49:8  
**orders** [3]  
31:17, 24;  
34:20  
**originally** [1]  
14:24  
**outlet** [1] 40:5  
**outside** [1]  
17:3

---

- P -

**p.o.** [2] 2:6, 9  
**painted** [2]  
15:20; 16:1  
**park** [1] 27:7

**parked** [2]  
28:8; 47:24  
**parking** [1]  
25:9  
**part** [7] 5:7;  
7:16, 20;  
20:14; 43:13;  
44:17; 45:18  
**parties** [2]  
4:3; 49:10  
**pass** [2] 15:24;  
37:12  
**passed** [1]  
29:10  
**passenger** [2]  
32:25  
**past** [13]  
12:13; 13:15,  
19; 14:1, 14;  
15:5; 20:16,  
22; 28:1;  
39:15; 41:10,  
15, 22  
**patrol** [4]  
11:2, 6; 21:13;  
43:21  
**patrolmen** [1]  
11:18  
**patted** [1] 35:7  
**paved** [1] 16:3  
**pennsylvania**  
[7] 1:1, 18, 24;  
2:3, 10; 49:2,  
16  
**perfectly** [1]  
4:22  
**person** [1]  
9:20  
**personally** [2]  
17:5; 49:5  
**phone** [14]  
7:15; 10:14;  
14:4, 5; 16:7;  
22:15, 24;  
23:11, 14, 23;  
24:1, 8, 13;  
28:25  
**photograph** [1]  
12:9  
**picked** [1] 24:5

**place** [4] 1:17; 8:15; 11:4;  
 10:25; 19:7; 12:8; 14:8;  
 33:24 16:19  
**placed** [1] **presented** [1]  
 27:25 14:1  
**plaintiff** [7] **presenting** [1]  
 1:3, 14, 25; 16:13  
 3:14; 22:16, **pretty** [2] 8:8;  
 25; 43:14 17:10  
**plaintiff's** [3] **previous** [1]  
 3:15; 42:23; 24:11  
 43:1 **previously** [6]  
**plan** [7] 18:5; 12:17; 21:2;  
 20:13; 26:4, 22:2; 24:16,  
 24; 27:1, 4, 8 19; 44:4  
**planning** [1] **proceeded** [2]  
 14:25 12:6; 30:3  
**plus** [1] 20:2 **processing** [2]  
**point** [12] 5:7; 6:9  
 12:6; 24:2; **produced** [1]  
 26:2, 9; 28:21; 42:25  
 31:19; 32:4; **properly** [1]  
 33:22; 34:2, 35:24  
 12, 19; 48:1 **propounded** [1]  
**police** [36] 49:9  
 5:11, 12, 14, **provide** [3]  
 18, 23; 6:2, 6, 12:7; 27:2;  
 9, 12; 7:8; 45:17  
 8:2, 10, 22; **provided** [1]  
 9:2, 23; 10:12; 22:1  
 11:1, 12; 12:1, **providing** [1]  
 17; 14:10, 11; 9:3  
 20:10; 21:4, **prying** [1] 33:8  
 15; 33:5; **public** [4]  
 34:15, 17; 1:15, 24; 49:5,  
 35:5; 43:18; 24  
 44:18, 24; **pull** [4] 30:14;  
 45:10, 22; 32:23; 33:15;  
 46:1; 47:15 42:9  
**poorly** [2] **pulled** [6]  
 42:13; 44:23 29:23; 31:13;  
**positioned** [1] 33:12; 38:11,  
 35:24 12; 41:6  
**possibility** [1] **purchased** [1]  
 13:5 16:17  
**post** [1] 18:14 **purchases** [1]  
**prescribed** [1] 12:13  
 12:12 **pursuit** [1]  
**present** [7] 25:10  
 1:22; 2:1;

---

- Q -

**questioned** [1]  
 24:5  
**questions** [9]  
 4:25; 38:24;  
 46:3, 11; 47:3,  
 4, 5; 49:9, 14

---

- R -

**radio** [8] 23:6,  
 7; 24:5;  
 28:13, 19, 25;  
 29:22; 36:3  
**radioed** [3]  
 29:8; 30:12;  
 42:9  
**rail** [2] 47:25  
**rails** [1] 35:23  
**ranks** [1]  
 21:14  
**rapid** [1] 30:23  
**rate** [1] 30:24  
**reach** [2]  
 18:18; 32:23  
**reached** [1]  
 20:4  
**read** [1] 22:21  
**really** [4]  
 14:12; 44:1, 4;  
 48:14  
**rear** [2] 32:25;  
 33:1  
**reason** [2]  
 15:10; 26:7  
**reasons** [2]  
 13:4; 34:15  
**receive** [1]  
 21:9  
**received** [3]  
 7:14, 15; 10:14  
**record** [3] 5:3;  
 17:1; 24:18  
**recross** [1] 3:2  
**redirect** [2]  
 3:2; 47:12  
**reduced** [1]  
 49:17

**refer** [2]  
 18:20, 23  
**referred** [1]  
 7:5  
**referring** [2]  
 18:24; 19:3  
**relayed** [2]  
 23:10, 14  
**remember** [11]  
 16:4, 22;  
 22:11, 18;  
 25:2, 17, 18;  
 26:1; 29:19;  
 31:2, 24  
**repeat** [1]  
 22:20  
**rephrase** [1]  
 4:21  
**reported** [1]  
 14:11  
**reporter** [2]  
 49:16, 18  
**reporter-notary**  
 [2] 1:15;  
 49:24  
**represent** [1]  
 46:12  
**request** [2]  
 6:18; 8:7  
**requesting** [1]  
 10:15  
**reserved** [1]  
 4:6  
**residence** [2]  
 14:7; 18:18  
**residential** [2]  
 12:24  
**residents** [2]  
 13:10; 27:3  
**resist** [1]  
 33:22  
**respective** [2]  
 4:3; 49:10  
**response** [8]  
 10:18; 22:14,  
 21, 23; 29:21;  
 44:21; 45:2, 12  
**responses** [1]  
 22:12



<b>retired</b> [3]	23:17; 26:17;	<b>short</b> [3]	<b>sort</b> [1] 31:9
5:15; 6:2;	29:13; 38:13	27:24; 29:5;	<b>sound</b> [1]
46:2	<b>runs</b> [1] 30:5	30:9	25:17
<b>reword</b> [1]	<b>rural</b> [1] 13:9	<b>shout</b> [1]	<b>south</b> [1] 30:5
45:6		34:20	<b>specialized</b> [1]
<b>rick</b> [1] 38:6	<hr/>	<b>shouting</b> [2]	21:16
<b>right</b> [21] 7:5;	- s -	31:17, 25	<b>specific</b> [2]
10:9; 13:16;	<b>safe</b> [1] 20:20	<b>show</b> [4]	23:16; 27:16
16:5; 18:20;	<b>safer</b> [1] 13:6	12:10; 22:19;	<b>specifically</b> [2]
22:7; 25:17;	<b>safest</b> [1] 27:2	28:9; 37:11	7:25; 24:12
29:23; 32:24;	<b>safety</b> [8]	<b>showed</b> [1]	<b>specifics</b> [1]
35:17; 38:2,	13:4; 15:6, 13,	25:20	24:21
20; 39:11, 18,	18; 18:7;	<b>side</b> [8] 12:24;	<b>speculate</b> [1]
20, 21; 40:2;	20:21; 34:15;	24:1; 25:3, 7;	28:14
43:15; 47:25;	35:22	31:13; 32:20,	<b>spell</b> [1] 5:2
48:20	<b>sale</b> [2] 22:17;	25; 38:18	<b>spot</b> [1] 26:15
<b>road</b> [60]	23:2	<b>sign</b> [2] 43:6,	<b>spots</b> [1]
12:19, 21;	<b>scene</b> [1]	8	30:14
13:8, 9, 12;	36:17	<b>signal</b> [5]	<b>spread</b> [1]
14:20, 22, 23;	<b>scribbling</b> [1]	41:24; 42:1,	15:17
15:2; 18:14;	43:5	11, 15, 19	<b>square</b> [2]
19:14, 18, 20;	<b>sealing</b> [1] 4:4	<b>signing</b> [1] 4:3	1:24; 39:13
20:1, 6, 7, 16,	<b>search</b> [4]	<b>siren</b> [2] 30:2,	<b>staged</b> [1]
22; 26:15, 20,	35:5, 6, 8;	8	39:1
22; 27:12, 21;	44:1	<b>sirens</b> [4]	<b>start</b> [1] 4:25
28:21; 29:13,	<b>section</b> [1]	40:25; 42:3,	<b>started</b> [1]
14; 30:5, 11,	44:8	15, 20	42:11
16, 18; 31:11;	<b>seeing</b> [2]	<b>site</b> [1] 23:3	<b>state</b> [2] 5:2;
38:8, 12, 13,	18:8; 26:1	<b>situations</b> [1]	21:11
15; 39:17;	<b>seem</b> [1] 14:9	32:7	<b>states</b> [1] 1:1
40:4, 6, 9, 13;	<b>select</b> [1]	<b>six-tenths</b> [1]	<b>station</b> [1]
41:9, 11, 17,	27:16	40:12	20:10
22, 25; 42:6,	<b>selected</b> [1]	<b>slight</b> [1]	<b>stationed</b> [2]
11, 12; 46:17,	26:3	30:21	41:9; 47:14
20; 47:16, 19;	<b>separate</b> [1]	<b>small</b> [1] 15:16	<b>stay</b> [1] 36:17
48:5, 11, 12	9:6	<b>someplace</b> [3]	<b>stayed</b> [4]
<b>roads</b> [3]	<b>sergeant</b> [11]	13:5; 15:7;	20:12, 14;
15:21; 48:8, 10	7:12, 13; 9:16,	27:14	32:5, 7
<b>roadway</b> [1]	17; 10:14, 17;	<b>sometimes</b> [1]	<b>steep</b> [1] 48:4
13:11	11:5; 20:21;	22:6	<b>stenographical</b>
<b>roan</b> [1] 19:21	36:2, 7, 17	<b>somewhere</b> [6]	<b>ly</b> [1] 49:15
<b>roan's</b> [1] 39:6	<b>serve</b> [1] 8:11	8:10, 11;	<b>sticks</b> [5]
<b>role</b> [2] 9:3, 7	<b>service</b> [2]	18:14; 19:13;	20:19; 28:1, 7;
<b>room</b> [2] 11:2,	21:20, 21	26:15; 39:7	35:21; 48:16
3	<b>services</b> [1]	<b>soon</b> [2] 41:4	<b>still</b> [7] 6:1, 8;
<b>roughly</b> [4]	12:2	<b>sorry</b> [8] 5:15;	16:1; 20:23;
5:21, 22;	<b>shawna</b> [2]	6:21; 10:8;	35:18; 40:10;
36:12; 37:22	2:5; 46:12	11:17; 18:10;	48:3
<b>route</b> [8] 15:2,		22:6; 35:1;	<b>stipulated</b> [1]
4; 19:13;		43:5	4:2

**stipulation** [1]  
4:1  
**stood** [1] 34:8  
**stop** [31] 5:13;  
7:2; 13:3, 6;  
15:1, 4, 10;  
18:5; 19:7;  
20:4, 9, 18, 20;  
26:3, 6, 9, 25;  
27:2, 9, 17, 25;  
28:1, 7; 29:16,  
20; 37:18;  
43:24, 25;  
46:19; 48:16  
**stopped** [7]  
30:8, 18; 31:7,  
9; 39:10, 23;  
43:22  
**stopping** [5]  
7:23; 14:25;  
30:12; 31:6;  
42:10  
**storage** [1]  
19:22  
**straight** [2]  
41:10, 22  
**street** [2]  
1:18; 2:3  
**streets** [1]  
12:24  
**stretch** [1]  
30:23  
**strike** [2] 15:9;  
28:17  
**strip** [1] 46:19  
**strips** [2]  
39:14; 41:9  
**stuff** [3] 17:9;  
32:7; 36:15  
**subscribed** [1]  
49:20  
**substance** [1]  
44:14  
**sumpter** [17]  
9:20, 25; 12:4,  
14; 13:16;  
14:2, 4, 11;  
15:12; 16:16,  
24; 17:6;  
18:18; 21:1;

23:1; 37:23;  
46:14  
**sumpter's** [9]  
12:12, 18;  
13:8; 16:20,  
21, 23; 17:1;  
37:18; 40:14  
**supermarkets**  
[1] 12:25  
**support** [2]  
9:3, 7  
**supported** [1]  
17:8  
**suppose** [1]  
27:15  
**surveillance**  
[3] 19:11, 12  
**sworn** [3]  
4:11; 49:7

---

- T -

**tack** [2] 39:14;  
41:9  
**taking** [1]  
49:12  
**taught** [2]  
22:4; 35:21  
**tells** [1] 44:19  
**tenths** [1] 20:6  
**testified** [2]  
4:11; 49:10  
**testify** [1] 49:7  
**testimony** [2]  
24:17; 49:19  
**thank** [4]  
43:11; 46:4;  
47:2; 48:18  
**themselves** [1]  
35:24  
**thoroughfare**  
[1] 48:15  
**thought** [1]  
19:24  
**three** [2] 5:25;  
38:2  
**through** [3]  
18:15; 21:14,  
24

**throughout** [1]  
40:8  
**throw** [1]  
33:19  
**timeline** [1]  
10:9  
**today** [1] 5:8  
**together** [1]  
26:24  
**took** [3] 26:2;  
30:9; 33:13  
**total** [1] 5:18  
**totally** [1] 9:6  
**towards** [2]  
30:5; 37:21  
**towed** [1] 37:3  
**township** [17]  
1:8; 2:10;  
5:12, 14, 18;  
6:12; 7:8; 8:2,  
10; 9:23;  
11:1, 12; 12:1;  
21:14; 27:3;  
38:13  
**traffic** [2]  
26:3, 6  
**trailer** [1]  
19:21  
**trained** [2]  
44:20; 45:11  
**training** [5]  
21:5, 11, 24;  
44:17; 45:1  
**trainings** [1]  
21:9  
**transcript** [3]  
22:7; 42:24;  
43:8  
**travel** [2]  
19:21; 30:7  
**trial** [1] 4:6  
**tried** [2]  
21:15; 48:16  
**trooper** [3]  
29:10; 35:9, 10  
**trout** [1] 12:23  
**truck** [1] 37:6  
**truth** [3] 49:7,  
8

**trying** [1]  
22:10  
**turn** [12]  
13:13; 20:7;  
27:22; 39:21;  
40:19, 21;  
41:24; 42:1,  
10, 11, 15, 19  
**turned** [9]  
19:17; 30:1,  
17; 40:4, 25;  
41:1, 5; 42:12  
**turning** [2]  
20:1; 41:17  
**turns** [1] 40:10  
**two-lane** [1]  
13:9  
**typewriting** [1]  
49:17  
**tyson** [5] 1:6;  
2:4; 19:11;  
26:14; 28:19

---

- U -

**under** [3]  
34:19; 44:8;  
49:17  
**undercover** [5]  
18:13; 19:6,  
13; 26:12;  
34:5  
**undersigned**  
[1] 49:4  
**understand** [3]  
4:20; 13:24;  
44:22  
**union** [1] 49:1  
**unit** [5] 6:9,  
13, 19; 7:5;  
20:17  
**united** [1] 1:1  
**unusual** [1]  
24:4  
**used** [3] 11:2;  
18:11; 21:6  
**using** [2] 21:9;  
22:1  
**usually** [2]  
16:17; 43:23

---

**- V -**

**various** [2]  
 21:16  
**vehicle** [22]  
 7:23; 18:13;  
 19:12; 26:5, 9,  
 11; 30:2;  
 31:7, 9; 34:2,  
 4, 10; 35:6,  
 18, 23; 37:3,  
 18; 39:10;  
 41:5; 43:22,  
 25; 47:15  
**voice** [1] 23:22  
**volunteer** [1]  
 21:20

---

**- W -**

**waited** [1]  
 28:11  
**waiting** [2]  
 28:9; 39:1  
**waived** [1] 4:4  
**warrant** [1]  
 8:11  
**warrants** [1]  
 44:2  
**weekly** [1] 8:5  
**west** [2] 1:18;  
 2:3  
**whereof** [1]  
 49:19  
**white** [2] 2:2;  
 47:4  
**whole** [1] 49:7  
**wilkes-barre**  
 [1] 1:24  
**william** [1] 2:5  
**williamsport**  
 [5] 1:9, 18;  
 2:3, 7; 12:22  
**window** [1]  
 32:11  
**wise** [1] 22:10  
**within** [3]  
 7:22; 34:25;  
 36:14

**without** [2]  
 30:3; 31:6  
**witness** [9]  
 4:10; 7:12;  
 39:5; 43:5, 10;  
 46:5, 8; 49:6,  
 13  
**witnesses** [1]  
 3:1  
**wooded** [1]  
 13:9  
**worded** [2]  
 42:13; 44:24  
**words** [1] 8:4  
**worked** [2]  
 21:1; 26:24  
**write** [2]  
 43:14, 15  
**written** [1]  
 22:12  
**wrote** [4]  
 22:14, 23;  
 43:9, 14

---

**- Y -**

**yards** [1] 15:16  
**year** [1] 25:14  
**years** [6] 5:19,  
 21, 24, 25;  
 21:4, 19  
**yielding** [1]  
 31:6  
**yourself** [1]  
 6:1

416 Brentwood Dr

